

Julie E. Oelsner, State Bar No. 125432
weintraub tobin chediak coleman grodin
Law Corporation
400 Capitol Mall, 11th Floor
Sacramento, California 95814
(916) 558-6000 – Telephone
(916) 446-1611 – Facsimile
joelsner@weintraub.com – E-Mail

Attorneys for Intech Mechanical

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re:	Case No.: 19-30088 (DM)
PG&E CORPORATION	Chapter 11
and	(Lead Case)
PACIFIC GAS AND ELECTRIC COMPANY,	(Jointly Administered)
Debtors.	

INTECH MECHANICAL'S NOTICE OF PERFECTION OF LIEN
(11 U.S.C. §§ 546 and 362)

TO THE CLERK OF THE BANKRUPTCY COURT, THE DEBTORS, AND ALL OTHER
INTERESTED PARTIES, AND THEIR ATTORNEYS OF RECORD:

You are hereby notified that Intech Mechanical (hereinafter "Intech") hereby perfects and continues to perfect, under 11 United States Code Sections 546(b) and 362(b)(3), its mechanic's lien in the principal amounts, after deducting all creditors and offsets, of \$6,220.24 for labor, equipment, material, and services provided by Intech generally described as electrical construction and related materials, labor, equipment, and services, incorporated in and constituting improvements to the real property commonly known as PG&E VCOC Building 4 – Plumbing, 4940 Allison Parkway, Vacaville, California 95688. The purported

owner of the property in question is Pacific Gas & Electric Co., 1850 Gateway Boulevard, 7th Floor, Concord, California 94250. Intech furnished the above-described labor, equipment, materials and services at the special instance and request of, and pursuant to a contract with Turner Construction Company, 1211 H Street, Sacramento, California 95814. This Notice constitutes the legal equivalent of having recorded a mechanic's lien and then having commenced a suit to foreclose upon the mechanic's lien. A true and correct copy of Intech's lien is attached hereto as *Exhibit A*.

You are further notified that Intech intends to enforce the lien to the fullest extent allowed by bankruptcy law and California law. This pleading does not constitute an admission as to the necessity of any such seizure or commencement.

Dated: March 6, 2019

weintraub tobin chediak coleman grodin
law corporation

By: /s/ Julie E. Oelsner
Julie E. Oelsner, State Bar No. 125432
Attorneys for Intech Mechanical

PROOF OF SERVICE

I am a citizen of the United States, employed in the City and County of Sacramento, California. My business address is 400 Capitol Mall, 11th Floor, Sacramento, California 95814. I am over the age of 18 years and not a party to, nor interested in, the within action. On March 6, 2019, I caused to be served the following:

INTECH MECHANICAL'S NOTICE OF PERFECTION OF LIEN

United States mail by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing mail in accordance with this office's practice whereby the mail is deposited in a United States mailbox after the close of the day's business.

United States First Class mail by placing such envelope(s) with postage thereon fully prepaid in the designated area for outgoing mail in accordance with this office's practice whereby the mail is deposited in a United States mailbox after the close of the day's business.

By personally delivering, or causing to be delivered, a true copy thereof to the persons at the addresses set forth below.

X CM/ECF Participants

I declare under penalty of perjury that the foregoing is true and correct. Executed March 6, 2019, at Sacramento, California.

/s/ Brenda Jennings
Brenda Jennings

Exhibit A

CALIFORNIA PRELIMINARY NOTICE

THIS NOTICE IS GIVEN PURSUANT TO CALIFORNIA CIVIL CODE SECTIONS 8034(a), 8102, 8200 ET SEQ.

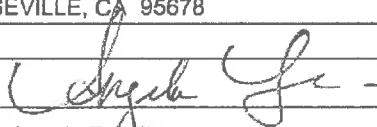
THIS IS NOT A LIEN. THIS IS NOT A REFLECTION ON THE INTEGRITY OF ANY CONTRACTOR OR SUBCONTRACTOR.

YOU ARE HEREBY NOTIFIED:

DATE: January 4, 2017

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

I
N F Intech Mechanical Company LLC
D O I 7501 GALILEE ROAD
I R R ROSEVILLE, CA 95678
V M
I
D
U
A
L

BY: 
Angela Familia
AP/AR Manager

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment
to perform Plumbing work per
Subcontract Work Order # 4700077377
dated 11/18/16, & Project # 161159.

JOB NAME AND LOCATION: PG&E VCOC-BLDG 4 PLUMBING
4940 ALLISON PARKWAY
VACAVILLE, CA 95688

Relationship to the parties
of the one giving this notice

Subcontractor

THE NAME AND ADDRESS OF THE PERSON WHO
CONTRACTED FOR THE PURCHASE OF (PRIVATE
WORKS) OR WHO WILL BE FURNISHED (PUBLIC WORKS)
SUCH LABOR, SERVICES, EQUIPMENT OR MATERIAL IS:

TURNER CONSTRUCTION COMPANY
1211 H STREET
SACRAMENTO, CA 95814

***** NOTICE TO PROPERTY OWNER *****
EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL, if the
person or firm that has given you this notice is not paid in full for labor,
service, equipment, or material provided or to be provided to your
construction project, a lien may be placed on your property. Foreclosure
of the lien may lead to loss of all or part of your property. You may wish to
protect yourself against this by (1) requiring your contractor to provide a
signed release by the person or firm that has given you this notice before
making payment to your contractor, or (2) any other method that is
appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a
statement of your legal rights. This notice is not intended to reflect upon
the financial condition of the contractor or the person employed by you on
the construction project. If you record a notice of cessation or completion
of your construction project, you must within 10 days after recording, send
a copy of the notice of completion to your contractor and the person or
firm that has given you this notice. The notice must be sent by registered
or certified mail. Failure to send the notice will extend the deadline to
record a claim of lien. You are not required to send the notice if you are a
residential homeowner of a dwelling containing four or fewer units.

TRUST FUNDS TO WHICH SUPPLEMENTAL FRINGE BENEFITS ARE PAYABLE:

U.A. Local Pipe Trades Trust
Fund

(MATERIAL MEN NOT REQUIRED TO FURNISH THE ABOVE)

Estimated total price of the labor, services, equipment, or material
provided and to be provided: **\$295,300.00**

PROOF OF SERVICE AFFIDAVIT

I, Angela Familia, declare that I served copies of the above PRELIMINARY NOTICE (check appropriate box).

(a) ☐ By personally delivering copies to _____ at _____
(name(s) and title(s) of persons served)
On _____, _____, at _____ .m.
(date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address
shown above on January 4, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on January 4, 2017

Signature of person making service: 

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]

CALIFORNIA PRELIMINARY NOTICE

THIS NOTICE IS GIVEN PURSUANT TO CALIFORNIA CIVIL CODE SECTIONS 8034(a), 8102, 8200 ET SEQ.

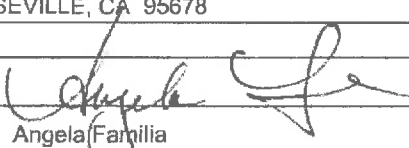
THIS IS NOT A LIEN. THIS IS NOT A REFLECTION ON THE INTEGRITY OF ANY CONTRACTOR OR SUBCONTRACTOR.

YOU ARE HEREBY NOTIFIED:

DATE: January 4, 2017

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

I
N F Intech Mechanical Company LLC
D O I 7501 GALILEE ROAD
I R R ROSEVILLE, CA 95678
V M
I
D
U
A
L

BY: 
Angela Familia
AP/AR Manager

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment

to perform Plumbing work per

Subcontract Work Order # 4700077377

dated 11/18/16, & Project # 161159.

JOB NAME AND LOCATION: PG&E VCOC-BLDG 4 PLUMBING

4940 ALLISON PARKWAY

VACAVILLE, CA 95688

***** NOTICE TO PROPERTY OWNER *****

EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL, if the person or firm that has given you this notice is not paid in full for labor, service, equipment, or material provided or to be provided to your construction project, a lien may be placed on your property. Foreclosure of the lien may lead to loss of all or part of your property. You may wish to protect yourself against this by (1) requiring your contractor to provide a signed release by the person or firm that has given you this notice before making payment to your contractor, or (2) any other method that is appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a statement of your legal rights. This notice is not intended to reflect upon the financial condition of the contractor or the person employed by you on the construction project. If you record a notice of cessation or completion of your construction project, you must within 10 days after recording, send a copy of the notice of completion to your contractor and the person or firm that has given you this notice. The notice must be sent by registered or certified mail. Failure to send the notice will extend the deadline to record a claim of lien. You are not required to send the notice if you are a residential homeowner of a dwelling containing four or fewer units.

TRUST FUNDS TO WHICH SUPPLEMENTAL FRINGE BENEFITS ARE PAYABLE:

U.A. Local Pipe Trades Trust

Fund

(MATERIAL MEN NOT REQUIRED TO FURNISH THE ABOVE)

Estimated total price of the labor, services, equipment, or material provided and to be provided: **\$295,300.00**

PROOF OF SERVICE AFFIDAVIT

I, Angela Familia, declare that I served copies of the above PRELIMINARY NOTICE (check appropriate box).

(a) ☐ By personally delivering copies to _____ at _____
(name(s) and title(s) of persons served)

On _____, _____, at _____, m.
(date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address shown above on January 4, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on January 4, 2017

Signature of person making service: 

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]

CALIFORNIA PRELIMINARY NOTICE

THIS NOTICE IS GIVEN PURSUANT TO CALIFORNIA CIVIL CODE SECTIONS 8034(a), 8102, 8200 ET SEQ.

THIS IS NOT A LIEN. THIS IS NOT A REFLECTION ON THE INTEGRITY OF ANY CONTRACTOR OR SUBCONTRACTOR.

YOU ARE HEREBY NOTIFIED:

DATE: January 3, 2017

THE NAME AND ADDRESS OF THE PERSON OR FIRM WHO HAS FURNISHED OR WILL FURNISH LABOR, SERVICES, EQUIPMENT OR MATERIAL OF THE FOLLOWING DESCRIPTION IS:

DESCRIPTION OF LABOR, SERVICES, EQUIPMENT OR MATERIAL:

Labor, materials and equipment

to perform Plumbing work per

Subcontract Work Order # 4700077377

dated 11/18/16, & Project # 161159.

I
N F Intech Mechanical Company LLC
D O I 7501 GALILEE ROAD
I R R ROSEVILLE, CA 95678
V M
I
D BY:
U
A Angela Familia
L AP/AR Manager

JOB NAME AND LOCATION: PG&E VCOC-BLDG 4 PLUMBING

4940 ALLISON PARKWAY

VACAVILLE, CA 95688

Relationship to the parties

of the one giving this notice Subcontractor

THE NAME AND ADDRESS OF THE PERSON WHO CONTRACTED FOR THE PURCHASE OF (PRIVATE WORKS) OR WHO WILL BE FURNISHED (PUBLIC WORKS) SUCH LABOR, SERVICES, EQUIPMENT OR MATERIAL IS:

TURNER CONSTRUCTION COMPANY

1211 H STREET

SACRAMENTO, CA 95814

***** NOTICE TO PROPERTY OWNER *****

EVEN THOUGH YOU HAVE PAID YOUR CONTRACTOR IN FULL, if the person or firm that has given you this notice is not paid in full for labor, service, equipment, or material provided or to be provided to your construction project, a lien may be placed on your property. Foreclosure of the lien may lead to loss of all or part of your property. You may wish to protect yourself against this by (1) requiring your contractor to provide a signed release by the person or firm that has given you this notice before making payment to your contractor, or (2) any other method that is appropriate under the circumstances.

This notice is required by law to be served by the undersigned as a statement of your legal rights. This notice is not intended to reflect upon the financial condition of the contractor or the person employed by you on the construction project. If you record a notice of cessation or completion of your construction project, you must within 10 days after recording, send a copy of the notice of completion to your contractor and the person or firm that has given you this notice. The notice must be sent by registered or certified mail. Failure to send the notice will extend the deadline to record a claim of lien. You are not required to send the notice if you are a residential homeowner of a dwelling containing four or fewer units.

TRUST FUNDS TO WHICH SUPPLEMENTAL FRINGE BENEFITS ARE PAYABLE:

U.A. Local Pipe Trades Trust

Fund

TO: OWNER, REPUTED OWNER OR PUBLIC ENTITY Pacific Gas & Electric Company
245 Market Street
San Francisco, CA 94111

TO: DIRECT CONTRACTOR OR REPUTED CONTRACTOR Turner Construction Company
1211 H Street
Sacramento, CA 95814

TO: LENDER, REPUTED LENDER, OR SURETY NONE

TO: SUBCONTRACTOR NONE

(MATERIAL MEN NOT REQUIRED TO FURNISH THE ABOVE)

Estimated total price of the labor, services, equipment, or material provided and to be provided: **\$295,300.00**

PROOF OF SERVICE AFFIDAVIT

I, Angela Familia, declare that I served copies of the above PRELIMINARY NOTICE (check appropriate box).

(a) ☐ By personally delivering copies to _____ at _____
(name(s) and title(s) of persons served)
On _____, _____, at _____, m.
(date) (year) (time)

(b) ☒ By First Class Certified or Registered Mail service, postage prepaid, addressed to each of the parties at the address shown above on _____.

I declare under penalty of perjury that the foregoing is true and correct.

Signed at Roseville, CA on _____

Signature of person making service: _____

[ATTACH RECEIPTS OF CERTIFIED OR REGISTERED MAIL WHEN RETURNED]

***Please make sure the job name is exactly as follows: PG&E VCOC Building 4 Plumbing.**

PRE-LIEN INFORMATION

217-08
Mireah

Project:	PG&E VCOC Building 4 PLUMBING Project # 161159
Project Location:	4940 Allison Parkway Vacaville, CA 95435 95688
General Contractor:	Turner Construction Company 1211 H Street Sacramento, CA 95814 Project Executive: Harry Smith 916-201-9804 Project Manager: Drake Costa 916-956-1206
Owner:	Pacific Gas & Electric Company 245 Market St. San Francisco, CA 94111
Construction Lender:	No
Bond:	None
Certified Payroll:	DCM Group 333 University Ave, Suite 200 Sacramento, CA 95825 (P) 916.443-2100
Accountant:	Janice Lacorte Phone: 510.267.8163 email: jlacorte@tcco.com invoicing: ncapc@tcco.com

If you have any questions in reference to the information provided above, please contact
Debbie DeVries @ 916-554-7930

SWO (REV 11/17/10)

SUBCONTRACT WORK ORDER

Turner Construction Company

Subcontractor: Intech Mechanical Company LLC 7501 Galilee Road, Roseville, CA, 95678	Office: Sacramento	Date: 11/18/2016
	Contract: PG&E VCOC - Building 4	Project Number: 161159
	Subcontract Work: Plumbing	Sub# 10111530
		Work Order# 4700077377

The terms and conditions of the Master Subcontract dated **01/01/2015** shall govern this Subcontract Work Order (SWO) with the exception of those modifications listed below:

1. Project: **PG&E VCOC - Building 4 Construction**
2. Premises: **4940 Allison Parkway, Vacaville, CA, 95688**
3. Architect: **DGA**
4. Owner: **PG&E Corporation**
5. Date of General Contract: **10/04/2016**
6. Overhead Markup: **See Formula for Changes**
7. Profit Markup: **See Formula for Changes**
8. Reserve applicable to this SWO is as follows: **10.00%**
9. All invoices are to be identified to the above referenced SWO Number. Invoices are to be submitted to **Turner Construction Company**, located at **1211 H Street, Sacramento, CA, 95814**.
10. Insurance Requirements

\$ 295,300.00

1. Worker's Compensation in accordance with Laws of the State in which the Work is situated.
2. General Liability: **\$ 3,000,000.00** / combined single limit.
General Aggregate: **\$ 3,000,000.00**

X. Subcontractor Election A). The above insurance coverages shall be provided by insurance companies selected by the Subcontractor.

or

_____. Subcontractor Election B). The above insurance coverages shall be provided through a consolidated insurance program (CCIP) arranged by **Turner Construction Company**. \$ _____ (The "Estimated Unburdened Payroll") warranted by Subcontractor as accurate for calculation of Insurance Premium for Subcontractor and enrolled Lower Tiers.

_____. Subcontractor Election B, Sub-Part B-1. Project utilizes a consolidated insurance program (CCIP) arranged by **Turner Construction Company**. Subcontractor is an Excluded Prime Tier with Enrolled Lower Tier Subcontractors. \$ _____ (The "Estimated Unburdened Payroll") warranted by Subcontractor as accurate for calculation of Insurance Premium for enrolled Lower Tiers.

or

_____. Subcontractor Election C). The above insurance coverages shall be provided through an Owner Controlled Insurance Program (OCIP.)

3. Automobile Liability : **\$ 1,000,000.00** / per accident